

Exhibit D

From: Chang, Cheryl S.
Sent: Wednesday, January 6, 2021 1:00 PM
To: sandy@saalimited.com
Cc: Metral, Nicole; Harris Powers; McElroy, Jessica; No, Hannah
Subject: RE: Depositions

Importance: High

Ms. Goulette,

It has now been nearly a month since you abruptly terminated your deposition, without any notice to us, by leaving your office during the deposition while we were on a short break and failing to return to your office where the computer was for your remote deposition. We never received any response from you to our emails and phone calls about rescheduling your deposition. If we do not hear from you by close of business on Thursday, January 7, 2020, we will move to compel your deposition and seek all appropriate sanctions.

We look forward to hearing from you.

Thank you,

Cheryl

Cheryl S. Chang | Blank Rome LLP
2029 Century Park East | 6th Floor | Los Angeles, CA 90067
O: 424.239.3472 | F: 424.239.3478 | chang@blankrome.com -----Original Message-----
From: Chang, Cheryl S.
Sent: Tuesday, December 8, 2020 3:06 PM
To: 'sandy@saalimited.com' <sandy@saalimited.com>
Cc: Metral, Nicole <NBMetral@BlankRome.com>; 'Harris Powers' <hpowers@upshawwilliams.com>; McElroy, Jessica <JMcElroy@BlankRome.com>
Subject: RE: Depositions

Ms. Goulette,

It is now 3pm PT/5pm CT, and it has been nearly an hour and a half since we took a break. We have not been able to reach you. I've called you twice and left voicemails and Ms. Metral has called and left you a voicemail as well. Since it appears you are not rejoining the deposition today, we will suspend the deposition for now and put on the record that you did not return. And we will coordinate with you to continue the deposition to another date. Please advise as soon as possible when you are available this month to start your deposition again.

Thanks,
Cheryl

Cheryl S. Chang | Blank Rome LLP
2029 Century Park East | 6th Floor | Los Angeles, CA 90067
O: 424.239.3472 | F: 424.239.3478 | chang@blankrome.com -----Original Message-----
From: Chang, Cheryl S.
Sent: Tuesday, December 8, 2020 2:47 PM

To: 'sandy@saalimited.com' <sandy@saalimited.com>
Cc: Metral, Nicole <NBMetral@BlankRome.com>; 'Harris Powers' <hpowers@upshawwilliams.com>; McElroy, Jessica <JMcElroy@BlankRome.com>
Subject: RE: Depositions
Importance: High

Ms. Goulette,

It's been over an hour since we went on break. Can you let us know if you are ok and are able to come back to the Zoom deposition? We were scheduled to reconvene at 2pm PT/4pm CT.

I've left two voicemails on your cell but have not been able to reach you.

Thanks,
Cheryl

Cheryl S. Chang | Blank Rome LLP
2029 Century Park East | 6th Floor | Los Angeles, CA 90067
O: 424.239.3472 | F: 424.239.3478 | chang@blankrome.com -----Original Message-----
From: Chang, Cheryl S.
Sent: Tuesday, December 8, 2020 2:18 PM
To: 'sandy@saalimited.com' <sandy@saalimited.com>
Cc: Metral, Nicole <NBMetral@BlankRome.com>; Harris Powers <hpowers@upshawwilliams.com>; McElroy, Jessica <JMcElroy@BlankRome.com>
Subject: RE: Depositions

Ms. Goulette,

Mr. Powers, the court reporter, the videographer and I are all ready and waiting for you to begin the deposition again. Please join us on Zoom as soon as you can.

Thank you,
Cheryl

Cheryl S. Chang | Blank Rome LLP
2029 Century Park East | 6th Floor | Los Angeles, CA 90067
O: 424.239.3472 | F: 424.239.3478 | chang@blankrome.com

-----Original Message-----
From: sandy@saalimited.com <sandy@saalimited.com>
Sent: Tuesday, December 8, 2020 8:37 AM
To: Metral, Nicole <NBMetral@BlankRome.com>
Subject: Re: Depositions

Dear Ms Metral:

I will be in attendance today for the deposition and I agree to accept electronic service to amend the new time and date of the proceeding. I will go to the veritext.com site now and log in to make the arrangements.

In regard to your second questions, I do not have an email address for Mr. Moffett outside of his SAA email and he has not utilized that for the past year to the best of my knowledge. Therefore, I do apologize but I do not speak to him and I do not have any access as to how to reach him via email. Looking in my cell phone, I do have a number for him,

however; I am not aware if it is still functional as I have not made any attempts to contact him. I will be more than happy to give that you you if you think that it may help. The number for Mr. Moffett is 601-580-1733

A do apologize that I am not able to supply you with more information, however; I do hope this this will help you.

Talk Soon

Sandra Goulette